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ADMITTED NY

May 8, 2024

By ECF


The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 15C
New York, New York 10007

MEMO ENDORSEMENT.

The requests to adjourn the trial date and to permit the defendant to appear remotely for a plea hearing are denied. The request to adjourn the in-person plea hearing is granted in part and denied in part and the plea hearing is adjourned to May 30, 2024 at 3:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. 5/8/2024

Re: *United States v. Siegel*, 23 Cr. 207 (LJL)

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Your Honor:

Gilbert Bayonne and I represent defendant Danielle Siegel in the above-referenced case. I write to request that: 1) Ms. Siegel be permitted to appear virtually at the parties' plea hearing presently scheduled for May 15, 2024 at 3:30 p.m.; or 2) in the alternative, that Ms. Siegel's plea hearing be adjourned to July 2024 for her to appear in person. The alternative proposal would require that the current June 17, 2024 trial date be adjourned *sine die*, which we also request.

We make this request because Ms. Siegel lives in Texas where she was recently seriously injured and continues to have movement restrictions as I explained in my April 24, 2024 letter, requesting a plea hearing. While Ms. Siegel's physician initially indicated that she would be able to travel by next week, the damage to her was more extensive. As shown in the attached medical records, doctors operated on April 30, 2024, repairing multiple fractures with plates and screws, as well as repairing a torn ligament. As reported by Ms. Siegel, she is currently on bed rest for the next two weeks and then will undergo six weeks of physical therapy. Ms. Siegel is fearful that if she travels against medical advice and were to injure herself, she could lose her Worker's Compensation benefits, which would cause her and her children financial hardship. She also risks exacerbating her injuries.

The parties have conferred and we are available for an in-person plea hearing throughout July 2024, except for July 1 through 5, 2024.

The government does not consent to Ms. Siegel appearing virtually as the CARES Act has expired but takes no position regarding the adjournment requests.

We appreciate the Court's consideration of this application.

Respectfully,
/s/ Michael Hueston

Enc.

Cc: Counsel of Record